

1 MARK E. FERRARIO
 Nevada Bar No. 1625
 2 ferrariom@gtlaw.com
 KARA B. HENDRICKS
 3 Nevada Bar No. 7743
 hendricksk@gtlaw.com
 4 GREENBERG TRAUERIG, LLP
 3773 Howard Hughes Parkway, Suite 400 North
 5 Las Vegas, Nevada 89169
 Telephone: (702) 792-3773
 6 Fax: (702) 792-9002

7 *Counsel for Defendant*
 8 *Clark County School District*

9 **UNITED STATES DISTRICT COURT**
 10 **DISTRICT OF NEVADA**

11 JOHN and JANE DOE I, Guardians Ad Litem
 for JOANN DOE I, a minor, individually and
 12 on behalf of all those similarly situated, and
 JOHN and JANE DOE II, Guardians Ad Litem
 13 for JOANN DOE II, a minor, individually and
 on behalf of all those similarly situated;

Case No. 2:16-cv-00239-APG-PAL

14 Plaintiffs,

15 vs.

**[PROPOSED] STIPULATION AND
 ORDER TO WITHDRAW MOTION FOR
 ORDER SHORTENING TIME (Doc. 79);
 ALLOWING PLAINTIFFS' MOTION
 FOR PROTECTIVE ORDER (Doc. 78) TO
 BE BRIEFED AND HEARD IN NORMAL
 COURSE; AND VACATING MAY 24,
 2018 HEARING**

16 JEREMIAH MAZO; CLARK COUNTY
 SCHOOL DISTRICT; DOES 1 through 20;
 17 DOE 1 through 20; ROE CORPORATIONS 1
 through 20;

18 Defendants.

(First Request)

19
 20 Plaintiffs, JOHN and JANE DOE I, GUARDIANS AD LITEM FOR JOANN DOE I, A
 21 MINOR AND JOHN AND JANE DOE II, GUARDIANS AD LITEM FOR JOANN DOE II, A
 22 MINOR (collectively, "Plaintiffs"), and Defendant CLARK COUNTY SCHOOL DISTRICT
 23 ("CCSD"), by and through their respective counsel of record, hereby jointly submit this stipulation
 24 by which Plaintiffs' agree to withdraw their Motion for an Order Shortening Time for Hearing on
 25 Plaintiffs' Motion of for Protective Order (Doc. 79) and CCSD agrees not to proceed with the
 26 depositions noticed for May 29, 2018 until such time as this Court is able to fully review and
 27

1 consider the issues raised in Plaintiff's Motion for Protective (Doc. 78) which the parties agree can
2 be briefed and heard in normal course.

3 WHEREAS Plaintiffs filed a Motion for Protective Order (Doc. 78) relating to certain
4 depositions noticed for May 29, 2018 and also filed a Motion for Order Shortening Time for a
5 Hearing on Plaintiffs' Motion of for Protective Order (Doc. 79);

6 WHEREAS CCSD will voluntarily agree not to proceed with the depositions noticed for
7 May 29, 2018 until the Court is able to fully review and consider the issues raised in Plaintiffs'
8 Motion for Protective Order as well as the response that CCSD intends to file;

9 WHEREAS the parties have additional deposition scheduled in this matter in the short term
10 and due to the importance of the issue at hand believe briefing in the normal course is in the best
11 interest of all parties;

12 WHEREAS during the course of the parties agreeing to the terms of the foregoing this Court
13 issued a minute order on May 18, 2018 scheduling a hearing for May 24, 2018 (Doc. 80) which is a
14 date on which deposition is scheduled in this matter;

15 THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs,
16 and CCSD that:

- 17 1. Plaintiffs' will withdraw their Motion for an Order Shortening Time for Hearing on
18 Plaintiffs' Motion of for Protective Order (Doc. 79);
- 19 2. CCSD will not proceed with the depositions noticed for May 29, 2018 until such time as
20 this Court is able to fully review and consider the issues raised in Plaintiff's Motion for
21 Protective (Doc. 78); and
- 22 3. That the briefing related to Plaintiff's Motion for Protective (Doc. 78) will proceed in the
23 normal course pursuant to the Federal Rules of Civil Procedure and applicable Local
24 Rules.

25 //

26 //

27

28

1 4. It is further agreed that the May 24, 2018 hearing scheduled pursuant to the minute order
2 issued on May 18, 2018 (Doc. 80) is hereby vacated with a new hearing to be set by the
3 Court following the full briefing of the Motion for Protective Order.
4

5 **IT IS SO STIPULATED.**

6 Dated this 18th day of May, 2018.

Dated this 18th day of May, 2018.

7 **GREENBERG TRAUIG, LLP**

EGLET PRINCE

8 */s/ Kara B. Hendricks*

/s/ Artemus W. Ham

9 MARK E. FERRARIO, ESQ. (NV BAR 1625)
10 KARA B. HENDRICKS, ESQ. (NV BAR 7743)
11 3773 Howard Hughes Parkway
12 Suite 400 North
13 Las Vegas, Nevada 89169
14 *Attorneys for Defendant Clark County*
15 *School District*

ROBERT T. EGLET, ESQ. (NV BAR 3402)
ARTEMUS W. HAM, ESQ. (NV BAR 7001)
AARON D. FORD, ESQ. (NV BAR 7704)
400 S. 7th Street, 4th Floor
Las Vegas, Nevada 89101
Attorneys for Plaintiffs

16 **-and-**

17 **HALL JAFFE & CLAYTON, LLP**
18 STEVEN T. JAFFE, ESQ. (NV BAR 7035)
19 7425 Peak Drive
20 Las Vegas, Nevada 89128
21 *Attorneys for Defendant Clark County*
22 *School District*

23 **ORDER**

24 **IT IS HEREBY ORDERED** that:

- 25 1. Plaintiff's Motion for Order Shortening Time (ECF No. 79) is **WITHDRAWN**.
26 2. The Motion for Protective Order (ECF No. 78) currently set for May 24, 2018, at 11:00 a.m., is
27 **VACATED** and **CONTINUED** to June 19, 2018, at 10:00 a.m. in Courtroom 3B.

28 DATED this 22nd day of May, 2018.


UNITED STATES MAGISTRATE JUDGE